

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

David Dickens , individually and on behalf of all those similarly situated Plaintiff,	§	
	§	
	§	
	§	
	§	CA No: 4:17-cv-642-ALM-KPJ
v.	§	
	§	
J. G. Wentworth Home Lending LLC ,	§	Jury Demanded
Defendant	§	

**THE PARTIES' JOINT MOTION TO FILE UNDER SEAL
JOINT MOTION TO APPROVE SETTLEMENT**

Plaintiff David Dickens, individually and on behalf of all those allegedly similarly situated, and Defendant J. G. Wentworth Home Lending LLC (collectively the "Parties"), respectfully request, under Local Rule CV-5(a)(7) that the parties' Joint Motion to Dismiss and Approve Settlement and all exhibits thereto may be filed under seal.

In the Joint Motion to Dismiss and Approve Settlement, the parties discuss the contents of the Confidential Settlement Agreement, attached to the Joint Motion to Dismiss and Approve Settlement as Exhibit A. Thus, the Parties submit this motion to seal contemporaneously with the Joint Motion in order to comply with their obligations under the Local Rules. In compliance with the confidentiality obligations imposed by the Confidential Settlement Agreement, the Parties respectfully request that the parties' Joint Motion to Dismiss and Approve Settlement, including the attached Confidential Settlement Agreement, be filed under seal.

Dated: February 18, 2019.

AGREED AS TO SUBSTANCE AND FORM:

Respectfully submitted,

<p><u>/s/ Chris R. Miltenberger</u> Chris R. Miltenberger Texas Bar No. 14171200</p> <p>THE LAW OFFICE OF CHRIS MILTENBERGER, PLLC</p> <p>1360 N. White Chapel, Suite 200 Southlake, Texas 76092 Telephone: (817) 416-5060 Facsimile: (817) 416-5062 chris@crmlawpractice.com</p> <p>Designated as Lead Counsel</p> <p>Jack Siegel</p> <p>Siegel Law Group PLLC 1044 N. Central Expy., Suite 1040 Dallas, TX 75231 Tel. (214) 706-0834 Fax (469) 339-0204 Jack@siegellawgroup.biz</p> <p>ATTORNEY FOR PLAINTIFFS</p>	<p><u>/s/ Colin D. Dougherty</u> Colin D. Dougherty Jonathan D. Christman</p> <p>Fox Rothschild LLP</p> <p>10 Sentry Parkway, Suite 200 Blue Bell, PA 19422-3001 Tel. (610) 397-6500 Fax (610) 397-0450 cdougherty@foxrothschild.com jchristman@foxrothschild.com</p> <p>David Grant Crooks Fox Rothschild LLP Texas State Bar No. 24028168 Two Lincoln Centre 5420 LBJ Freeway, Suite 1200 Dallas, TX 75240 Tel. (972) 991-0889 Fax (972) 404-0516 dcrooks@foxrothschild.com</p> <p>Brian A. Berkley Fox Rothschild LLP 2000 Market Street, 20th Floor Philadelphia, PA 19103-3222 Tel. (215) 299-2000 Fax (215) 299-2150 bberkley@foxrothschild.com</p> <p>ATTORNEYS FOR DEFENDANT</p>
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CERTIFICATE OF CONFERENCE

I certify that counsel for Plaintiffs and counsel for Defendant have conferred about this Motion and the relief requested herein in compliance with Local Rule CV-7(h) and that the Motion is agreed to by both parties.

By: /s/ Chris R. Miltenberger
Chris R. Miltenberger

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2019, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the court.

By: /s/ Chris R. Miltenberger
Chris R. Miltenberger